

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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DINO ANTOLINI,

Plaintiff,

Case No.: 1:19-cv-07385

vs.

N CORPORATION, NICHOLAS S. PRITZKER,
SHIYANG HUI and TIPSY SHANGHAI
RESTAURANT MANAGEMENT INC.,

Defendants.

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PLAINTIFF'S RESPONSE/ANSWER TO DEFENDANTS' COUNTERCLAIM

Plaintiff, DINO ANTOLINI, through undersigned counsel, hereby files his Response/Answer to Defendants N CORPORATION, NICHOLAS S. PRITZKER, SHIYANG HUI and TIPSY SHANGHAI RESTAURANT MANAGEMENT INC., Answer to Complaint with Counterclaim, (hereinafter the "Counterclaim"), and herein says:

1. All claims and/or allegations against Plaintiff, under the heading "AFFIRMATIVE DEFENSE WITH COUNTERCLAIM", hereby denied, baseless, and fully disputed. In fact, Defendants provide no evidence whatsoever to support their baseless, meritless and spurious allegations therein.

2. **WHEREFORE**, the Plaintiff hereby, once again, demands judgment against Defendants and requests the following injunctive and declaratory relief:

- A. The Court declare that the subject property and Subject Facility owned, operated, leased, controlled and/or administered by the Defendants are violative of the ADA, the New York City Human Rights Law, and of the New York State Human Rights Law;
- B. The Court enter an order requiring the Defendants to alter their facilities and amenities to make them accessible to and usable by individuals with disabilities to the full extent required by the Title III of the ADA and by NYCHRL, and the NYSHRL;

- C. The Court enter an order directing the Defendants to evaluate and neutralize their policies, practices and procedures toward persons with disabilities, for such reasonable time so as to allow the Defendants to undertake and complete corrective procedures to the Subject Facility;
- D. The Court award reasonable attorney's fees, all costs (including, but not limited to court costs and expert fees), damages, and other expenses of suit, to Plaintiff; and
- E. The Court award such other and further relief as it may deem necessary, just and proper; and
- F. The Court deny the Defendants' Counterclaim, as well as the Defendants requests therein, including for attorney's fees and/or costs.

Dated: Syosset, New York
September 13, 2019

CERTIFICATE OF SERVICE

I hereby certify that on September 13th, 2019 I electronically filed the foregoing document with the Clerk of Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record, corporations, or pro se parties identified on the Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or via U.S. mail for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

S/S
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